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Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-fifth session
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Item 4 (c) of the provisional agenda
Listing, classification and packing: miscellaneous

Packaging provisions for waste aerosols

Transmitted by the expert from the United Kingdom[1]

Background

1. The expert from the United Kingdom believes that there are some anomalies in the large packaging provisions for waste aerosols.

2. The packing instructions applicable to UN 1950 aerosols are P207 and LP02, respectively associated with special provisions PP87and L2 for waste aerosols. P207 includes no requirement for an inner packaging to be used, but LP02 does. Both PP87 and L2 require that for waste aerosols transported in accordance with SP 327 there must be a means of retaining in the packaging (e.g. by absorbent material) any free liquid that might escape during transport.

3. The expert from the United Kingdom considers that it is unnecessary for the waste aerosol large packaging provisions to require both an inner packaging (which must not leak under test conditions) and a separate means of retaining free liquid. The LP02/L2 requirements should therefore be aligned with those for P207/PP87. This can be done quite easily by indicating that meeting the L2 conditions removes the need to use an inner packaging. Alternatively, the text could specify that either a means of retaining free liquid OR an inner packaging may be used. As L2 is specific to waste aerosols, it would not have

[1] In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

consequences for the transport of any other substance or article with LP02 as packing instruction.

4. The second issue concerns the packing group requirements. Under P207, where a packaging is used for net masses in excess of 55kg for fibreboard and 125kg for other than fibreboard, the required test level is packing group II. Under the L2 provision the test requirement is given as packing group III. This means that, for instance, a 451 litre box (with a 0.8m drop test) could be used instead of a 449 litre box (with a 1.2m drop test).

5. There are no similar reductions in test levels for a larger mass anywhere else in the Model Regulations. It would therefore seem sensible to align L2 with P201, with a common requirement to meet packing group II standards.

Proposal

6. In special packing provision L2:

(a) In the first sentence, amend "packing group III performance levels" to read "packing group II performance levels",

(b) Amend the second sentence to read:

"Large packaging for waste aerosols transported in accordance with special provision 327shall have in addition a means of retaining any free liquid that might escape during transport e.g. absorbent material. The use of inner packagings is not necessary.".

(The proposed new text is the same as is used in relation to aerosols at 3.4.2.)

Alternative proposal

7. In special packing provision L2:

(c) In the first sentence, amend "packing group III performance levels" to read "packing group II performance levels"

(d) Amend the second sentence to read:

"Large packaging for waste aerosols transported in accordance with special provision 327 ~~shall~~ may have in addition, and as an alternative to the use of inner packaging, a means of retaining any free liquid that might escape during transport e.g. absorbent material."

The expert from the United Kingdom prefers the first option, as the second would logically lead to a need to identify suitable inner packagings in P207.